

1 ROBIN D. SHOFNER (272552)

[shofner@mobilaw.com](mailto:shofner@mobilaw.com)

2 **MOBO LAW, LLP**

3 10280 Donner Pass Road

Truckee, California 96161

4 Tel: (530) 214-8700

Fax: (530) 214-8158

5 Attorneys for Mary McAlvain

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8 **UNITED STATES BANKRUPTCY COURT**

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**NORTHERN DISTRICT OF CALIFORNIA**

10

**SAN FRANCISCO DIVISION**

11

12 *In re:*

13 PG&E CORPORATION

14 -and-

15 PACIFIC GAS AND ELECTRIC  
16 COMPANY

17 Debtors.

18 ) **Case No.: 19-30088 (DM)**  
19 ) Chapter 11  
20 ) (Lead Case)  
21 ) (Jointly Administered)  
22 )  
23 ) **DECLARATION OF ROBIN D. SHOFNER**  
24 ) **IN SUPPORT OF MOTION PURSUANT TO**  
25 ) **FEDERAL RULE OF BANKRUPTCY**  
26 ) **PROCEDURE 9006(b)(1) TO DEEM THE**  
27 ) **CLAIM OF MARY McALVAIN TIMELY**  
28 ) **FILED**  
29 )  
30 ) Date: August 23, 2022  
31 ) Time: 10:00 a.m.  
32 ) Dept.: To Be Held Telephonically  
33 ) United States Bankruptcy Court  
34 ) Courtroom 17  
35 ) 450 Golden Gate Avenue, 16<sup>th</sup> Floor  
36 ) San Francisco, CA  
37 ) Judge: Honorable Dennis Montali  
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39 ) **Objection Deadline: August 16, 2022**  
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80 I, Robin D. Shofner, declare and state as follows:

81 1. I am the attorney of record for Mary McAlvain, the Movant herein. I am

1 licensed to practice law in the State of California. I have personal knowledge of the facts stated  
2 in this Declaration and, if called as a witness, could and would testify competently to the truth  
3 of the facts stated herein. This Declaration is submitted in support of the Motion Pursuant to  
4 Federal Rule of Bankruptcy Procedure 9006(b)(1) to Deem the Claim of Mary McAlvain  
5 Timely Filed (the "Motion").

6 2. Mary McAlvain (Movant) is a survivor of the Camp Fire and owned a home  
7 located at 1531 Judy Lane, Paradise, California for almost twenty-five (25) years prior to the  
8 Camp Fire.

9 3. Movant suffered significant, life changing losses, i.e., the loss of her home, all of  
10 her belongings, and being displaced from her accustomed lifestyle, as a result of the Camp Fire  
11 thereby causing Movant severe emotional trauma, PTSD, and high blood pressure.

12 4. This trauma was compounded by Movant's proximity to the dangerous and life  
13 threatening Camp Fire which forced her to flee for her life.

14 5. As a direct and proximate result of these losses and hardship, Movant became  
15 unable to manage her personal affairs. Upon learning of PG&E's bankruptcy, Movant sunk into  
16 a state of total despair.

17 6. Movant was unaware of the relevant bar dates for filing a proof of claim.  
18 Movant's niece learned that Movant's losses might still be compensable when the bar dates  
19 were extended.

20 7. I was contacted by Movant's niece in May 2022. Movant's niece inquired  
21 whether Movant could possibly file a late proof of claim in this matter and I advised that she  
22 could potentially do so. It is my understanding that Movant's niece relayed this information to  
23 Movant at or around this same time and that this is the first time Movant became aware that she  
24 had potentially viable claims that could be asserted in the pending matter.

25 8. Shortly thereafter, MOBO Law, LLP was retained to prepare and file the within  
26 Motion to allow Movant to file a late claim based on excusable neglect and lack of prejudice to  
27 the Debtor. I informed Movant around this same time that she would need to prepare a  
28 narrative of her experience and begin compiling data for the Motion and associated Proof of

1 Claim.

2 9. My firm had some internal difficulties in finalizing my registration for  
3 ECF/Pacer with this Court, which resulted in some additional delay in the filing of this Motion  
4 none of which was attributable to Movant.

5 I declare under penalty of perjury under the laws of the State of California and the  
6 United States that the foregoing is true and correct.

7  
8 Dated: August 2, 2022

9 /s/ Robin D. Shofner  
10 Robin D. Shofner